

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: GEORGE D. McCONNELL, aka : Chapter 13
George Douglas McConnell, aka : Case No. 18-bk-15806-ref
George McConnell, :
Debtor :

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES Debtor **GEORGE D. McCONNELL**, by and through his attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., and in Response to the Trustee's Motion to Dismiss avers:

1. Admitted in part and Denied in part. The Trustee has changed.
2. Admitted.
3. Denied. Debtor has made all Plan payments required. Debtor merely awaits the passing of the February 27, 2019, governmental claims bar deadline, and any extension thereof, before preparing and filing a First Amended Chapter 13 Plan.
4. Denied to the extent the averments of paragraph 4 are other than a statement or conclusion of law or misplaced request for relief that does not require a response.

WHEREFORE, Debtor **GEORGE D. McCONNELL** respectfully prays this Honorable Court for an Order than the Trustee's Motion to Dismiss be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

FISHER CHRISTMAN

By: /s/ J. Zac Christman
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